

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

UNITED STATES OF AMERICA,

Case No. 6:15-CR- 113-mc

Plaintiff,

INDICTMENT

v.

Count 1: Conspiracy to File Retaliatory Liens
18 U.S.C. § 1521

RONALD D. JOLING, and
DORTHEA J. JOLING,

Count 2: Retaliatory Liens
18 U.S.C. § 1521

Defendants.

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this indictment:

1. RONALD D. JOLING and DORTHEA J. JOLING (hereinafter referred to collectively as “the JOLINGS”) were husband and wife.
2. The JOLINGS resided in the District of Oregon.
3. In or about October 2011, the Grand Jury indicted the JOLINGS in the District of Oregon on various charges related to the payment of taxes.
4. In or about November 2012, the Court assigned the case against the JOLINGS to Chief United States District Judge Ann Aiken. Chief Judge Aiken then presided over the trial of *United States v. Joling et al.*, 6:11-cr-60131-AA, in or about October 2014.

5. United States Magistrate Judge Thomas M. Coffin was the Magistrate Judge assigned to the case.
6. Mary L. Moran served as the Clerk of Court.
7. The United States Attorney's Office for the District of Oregon prosecuted the case.
8. S. Amanda Marshall served as the United States Attorney for the District of Oregon.
9. Assistant United States Attorney Scott E. Bradford served as the lead prosecutor in the case.

COUNT 1
(Conspiracy to File Retaliatory Liens)

10. From on or about August 15, 2013 through on or about February 26, 2014, in the District of Oregon and elsewhere, the defendants, RONALD D. JOLING and DORTHEA J. JOLING, knowingly conspired with each other and with others, known and unknown to the Grand Jury, to file false liens and encumbrances in public records against the real and personal property of officers and employees of the United States (the "individual victims") on account of the officers' and employees' performance of official duties, knowing and having reason to know that such liens and encumbrances were false and contained materially false, fictitious, and fraudulent statements and representations. In order to effect the object of the conspiracy, the JOLINGS had the false liens and encumbrances and other documents related thereto, including a "Notice of Security Interest with Intent to Perfect," prepared and mailed to the individual victims in Oregon, or filed in the public record, including *The Sentinel* newspaper in Coquille, Oregon, or in a private record which is generally available to the public on the internet.

In violation of Title 18, United States Code, Section 1521.

COUNT 2
(Retaliatory Liens)

11. On or about February 25, 2014 through February 26, 2014, in the District of Oregon, the defendants, RONALD D. JOLING and DORTHEA J. JOLING, attempted to file and filed in the public records of the State of California, via the California Secretary of State's website, false liens and encumbrances against the real and personal property of each of the following individual victims, all of whom are officers or employees of the United States government: (1) Chief United States District Judge Ann Aiken; (2) United States Magistrate Judge Thomas M. Coffin; (3) Clerk of Court Mary L. Moran; (4) United States Attorney S. Amanda Marshall; and (5) Assistant United States Attorney Scott E. Bradford. Knowing and having reason to know that the liens and encumbrances were false and contained materially false, fictitious, and fraudulent statements and representations—including a false statement that the individual victims owed the JOLINGS \$100,003,000.00—the JOLINGS filed the false liens and encumbrances against the individual victims on account of the performance of their official duties relating to the criminal case *United States v. Joling et al.*, 6:11-cr-60131-AA. In violation of Title 18, United States Code, Section 1521.

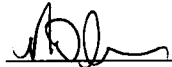
Dated this 18th day of March 2015.

A TRUE BILL.


GRAND JURY FOREPERSON

Presented by:

S. AMANDA MARSHALL
United States Attorney

A handwritten signature in black ink, appearing to read 'N. Olson', is positioned above a horizontal line.

NANCY M. OLSON
Assistant United States Attorney